

## POLICY AGAINST VIOLENCE AND HARASSMENT

<b>Author/Administrator</b>	<b>[Name]</b>	<b>[Location]</b>	<b>[Date]</b>	<b>[Signature]</b>
<b>Approver</b>	<b>[Name]</b>	<b>[Location]</b>	<b>[Date]</b>	<b>[Signature]</b>
<b>Approver</b>	<b>[Name]</b>	<b>[Location]</b>	<b>[Date]</b>	<b>[Signature]</b>

Company: SCICO SCICO S.A. (hereinafter referred to as "SciCo").

ADDRESS: 210 Leoforos Kifisias, CHALANDRI, ATTIKI

TAX ID: 998092469

GEMI: 165755901000

Details of Employer: Legal Representative

1. NAME : Anagnostopoulos

NAME: Theodore

FATHER'S NAME: Christos

TAX ID: 077594186

D.O.Y. of Chalandri

HOME ADDRESS: Agia Varvara 60

Postal code:15231

2. NAME : Efstathiadias- Stagos

NAME: Michail Christos

FATHER'S NAME: Petros Konstantinos

TAX ID: 107158270

D.O.Y.: IST Athens

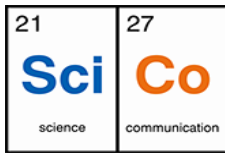
HOME ADDRESS: 43 Ellanikou 43

Postal code:11635

Responsible for policy compliance: Thodoros Anagnostopoulos

Employees: 6 (full & part time)

Persons responsible for receiving complaints within SciCo:



## **1. GENERAL**

SciCo shall comply with all measures and obligations related to the application of the provisions of Part II of Law no. 4808/2021 on the prevention and treatment of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

This policy is adopted in accordance with Articles 9 and 10 of Law No. 4808/2021 and the regulations adopted pursuant thereto and applies to the persons referred to in par. 1 of article 3 of Law no. 4808/2021.

### **PURPOSE**

The aim of this policy is to create and consolidate a working environment that respects, promotes and protects human dignity and the right of every person to a working environment free from violence and harassment. In this regard, SciCo declares that it recognizes and respects the right of every employee and/or partner and/or volunteer to a working environment free from violence and harassment and that it will not tolerate such behavior in any form from any person.

SciCo is committed to providing a safe and healthy working environment wherever it operates.

SciCo wishes to ensure that all employees/collaborators/volunteers are treated with dignity and respect by their colleagues.

All SciCo employees/partners/volunteers are expected to behave appropriately in their work environment and to show sensitivity and respect for the personalities of others.

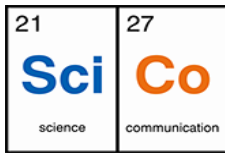
SciCo has a zero tolerance policy towards any incident of harassment and sexual harassment in the workplace and/or at the various events/festivals and/or other activities (projects) in which it participates.

All forms of violence and harassment, whether related to or arising out of work, including gender-based violence and harassment and sexual harassment, are absolutely prohibited for all SciCo employees/staff/volunteers. This policy provides a framework for preventing, addressing and responding to violence and sexual harassment in the workplace.

## **2. FIELD OF APPLICATION**

3.1. This applies to:

- All SciCo employees with a contract of employment (full-time or part-time, permanent or fixed term),
- Employees employed under a contract for work, independent services, or under a paid mandate,



- Employees employed through third party service providers, Volunteers who are employed in SciCo's activities and/or projects regardless of the period of their volunteer services to SciCo,
- To interns, trainees or any students doing their internship at SciCo,
- Individuals seeking employment with SciCo and participating in the relevant recruitment processes, as well as former employees (whose employment relationship has ended) with SciCo.

3.2. In particular, this policy covers any conduct:

- at the SciCo premises
- via SciCo's communication system and related equipment (via teams or another corresponding platform)
- events, activities, training, organized by SciCo and taking place outside of the company's headquarters and outside of work/service
- on business trips
- at business lunches
- any contact outside of work time, including texting or social media use from personal accounts, but which has an impact on SciCo.

3.3. For the purposes of the application of this article, forms of violence and harassment against the persons referred to in article 3.1 may take place, in particular:

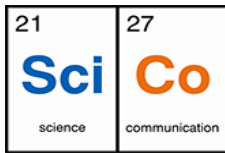
- (a) in the workplace, including public and private areas and places where the employee/co-worker/volunteer is active, receives remuneration, takes a break, in particular, for rest or food, in personal hygiene and care facilities, changing rooms or accommodation provided by SciCo,
- (b) travel to and from work, other travel, travel, education, and work-related events and social activities; and
- (c) in work-related communications, including those carried out by means of information and communication technologies.

### **3. DEFINITIONS - FORMS OF VIOLENCE AND HARASSMENT IN THE WORKPLACE**

For the purposes of this:

- (a) "Violence and harassment" mean any form of conduct, act, practice or threat thereof, whether occurring on an isolated or repeated basis, which is intended to cause, results in or is likely to result in physical, psychological, sexual or economic harm.

One form of such violence and harassment is 'bullying', which is offensive, intimidating, malicious or abusive behaviour, including the misuse of force, that can make a person feel vulnerable, upset, embarrassed, insulted or



threatened. Power does not necessarily mean holding a position of authority, but can include both personal power and the power to coerce others through fear or intimidation.

Dominant behavior can be physical, verbal or non-verbal.

It may also include indicative behaviors such as:

- Unjustified exclusion of a person from normal business communications so that they feel unwelcome
- Undermining or deliberately obstructing the work of another
- Circulation of negative rumours or gossip
- Inappropriate criticism or derogatory language about a person in front of others
- Any other contact that suggests hostility, disrespect or unfavorable treatment of a person.

The above behavior may be conscious or unconscious. In any case, reasonable, bona fide and constructive criticism of an employee's/co-worker's/volunteer's performance or behavior, or reasonable advice on how to improve work performance, does not constitute bullying behavior.

(b) 'harassment' means any form of conduct which has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, humiliating or offensive environment, whether or not it constitutes a form of discrimination.

Indicative examples include the behaviours listed below:

- unwanted verbal contact with threats, profanity, derogatory comments or insults, unwanted slurs, derogatory jokes, or comments or teasing about someone's clothing,
- unwanted contacts or postings, such as posting or sharing derogatory photos, cartoons or drawings or sharing emails, texts or images that degrade, insult or embarrass another person,
- unwanted physical contact such as unwanted touching or assault.

(c) "Gender-based harassment" means forms of conduct related to a person's gender that have the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating, humiliating or offensive environment and includes the following:

- harassment': where unwanted conduct related to the sex of a person occurs with the purpose or effect of violating the dignity

of that person and creating an intimidating, hostile, degrading, humiliating, dehumanizing or offensive environment.

- "sexual harassment" means any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, intended to or having the effect of violating the dignity of a person, in particular by creating an intimidating, hostile, degrading, humiliating, humiliating or offensive environment.

(d)"Retaliation" means punishing someone or taking adverse employment action because a concern or complaint of possible harassment, discrimination, violence or retaliation was raised or because someone participated in an investigation.

Examples may include:

- Disciplinary action or reduction of a person's duties, or
- Demotion or transfer of an employee.

#### **4. POTENTIAL RISKS OF VIOLENCE AND HARASSMENT AT WORK**

See annex 1 attached.

#### **5. PREVENTION AND PROTECTION MEASURES/STAFF INFORMATION AND AWARENESS-RAISING ACTIVITIES**

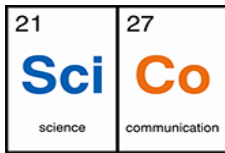
Measures and practices for the prevention and control of psychosocial risks and violence in particular include, but are not limited to:

6.1 Communicating this policy in the workplace and informing staff/collaborators and/or volunteers through any appropriate means including the use of SciCo's social media including but not limited to the following google mails, google meets, viber and messenger and obtaining their signed and responsible statements that they have read this policy and consent to it and agree to comply with this policy, as the case may be following any written amendments to this policy.

The purpose of the notification is to:

- (a) the cultivation of a working climate, with the core values of respect for human dignity, cooperation and mutual assistance,
- (b) open communication with those directly involved to resolve and smooth out conflicts and disagreements.

6.2 Education & Staff Training:



An important means of preventing and dealing with harassment and sexual harassment is the training of all SciCo staff. Training for all SciCo employees will take place on a regular basis and will include training on topics such as:

- (a) the forms of harassment and sexual harassment and the factors that encourage it in the workplace,
- (b) responsibilities in relation to any problems that may arise or be reported,
- (c) the manner in which the incidents are handled with confidentiality, discretion and seriousness and with respect for the rights of the defence and the presumption of innocence of the person complained against.

#### 6.3 Conduct a confidential and anonymous annual survey:

An evaluation is carried out on a regular basis of the effectiveness of the preventive and response measures in place, with the participation of employees. On an annual basis, a confidential and anonymous survey will be carried out under the responsibility of SciCo in order to identify incidents of violence and harassment within the premises and to reflect the work climate.

#### 6.4 Psychological support line

The direct assistance mechanisms that exist successfully in Greece are the following:

SOS 15900 - is a national service that enables women victims of violence or third parties to immediately contact a gender-based violence agency. The line is staffed by psychologists and sociologists who provide immediate assistance in emergency and urgent cases of violence on a 24-hour basis, 365 days a year. At the same time it is possible for women to contact the line electronically via the e-mail address: [sos15900@isotita.gr](mailto:sos15900@isotita.gr).

197) National Centre for Social Solidarity Telephone Line (for calls outside the prefecture 210-197) People of all ages can anonymously request help and information on specialised psychosocial support and social solidarity services 24 hours a day, 365 days a year.

- 6.5 Avoiding excessive workloads that lead to stress and burnout - factors that can encourage aggressive behaviour.

- 6.6 Assigning clear roles and responsibilities and ensuring that employees/partners/volunteers have the necessary training and information to carry out their duties.

6.7 Adjusting working hours taking into account the specific needs of workers/co-workers/volunteers (e.g. young mothers, older workers, workers with chronic illnesses) and avoiding lonely work.

6.8 Review/update the study to assess potential risks of violence and harassment when new risks or inadequate preventive measures are identified.

## **6. RIGHTS OF THE PERSONS CONCERNED**

Any person who has been subjected to violence and/or harassment has the following rights:

- Claim judicial protection and full compensation, covering any positive and consequential damage and moral damages.
- To appeal to the Labour Inspectorate and the Ombudsman.
- To file an internal complaint as mentioned in 7.
- Request the assistance of the legal persons and associations of persons referred to in paragraph 1. 2 of Article 22 of Law No. 3896/2010.
- Request a change of place and/or working hours, as well as request to work remotely, if this is possible.
- To leave the workplace for a reasonable period, without loss of pay or other adverse consequences, if he or she reasonably believes that there is an imminent serious risk to his or her life, health or safety, in particular if the necessary reasonable measures to protect him or her have not been taken or if such measures are not sufficient to stop the violent and harassing behavior. In such a case, the person subjected to the violence or harassment shall inform SciCo in writing in advance, stating the incident of violence and harassment and the facts which justify the belief that there is a serious threat to his or her life, health or safety.

## **7. POLICY FOR THE MANAGEMENT OF INTERNAL COMPLAINTS** **-Safeguarding pathway**

8.1 Any person who believes that he/she has been subjected to violence and/or harassment, as well as any person who becomes aware of incidents of violence and/or harassment in breach of this policy, must report the incident immediately and without delay to the person within SciCo to whom he/she refers or to Mr Thodoris Anagnostopoulos. However, anonymity may in some cases limit SciCo's ability to investigate the complaint.

8.2 Persons within SciCo who receive reports/complaints about incidents of violence and harassment (from the persons referred to them for the purposes of the heresy, take immediate and appropriate measures to protect the affected person and at the same time report the matter in writing to Mr. Thodoris Anagnostopoulos. In consultation with him and upon agreement with the complainant, pending the full investigation and final examination of the complainant, the following indicative measures may be taken temporarily to protect the affected person, as appropriate:

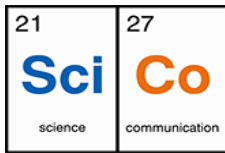
- change of staff working hours,
- transfer of the complainant to another work department,
- the employment of the complainant by teleworking or telecommuting, depending on the nature of his/her duties,
- grant of paid leave to the complainant.

8.3 SciCo, through Thodoris Anagnostopoulos, who has been appointed as the person responsible for the strict adherence to this SciCo policy, investigates and examines the allegations immediately, with impartiality and protection of the confidentiality and personal data of the victims and the complainants, to the extent possible under the circumstances. When investigating complainants, anonymity will be sought to be respected as far as possible, unless there are reasons to remove it, either to facilitate the investigation of the complaint (e.g.e.g. interview with the complainant individually and separately with the complainant and witnesses, otherwise any investigation will be fruitless and the purpose of the law to protect victims will not be achieved) or following intervention by a public authority, subject, however, to the conditions required by law for the protection of the personal data of those involved and the observance of confidentiality and secrecy by those who may obtain such knowledge.

Where possible, the SciCo will also interview the person alleged to have committed the harassment. Where appropriate and depending on the circumstances, the SciCo may also review documents (including electronic communications) relating to the investigation that are available or accessible. When the investigation is complete, the SciCo will, where appropriate, inform the complainant and the person alleged to have committed the harassment of the results of the investigation.

8.4 If the allegations are confirmed, in whole or in part, SciCo shall take the necessary appropriate and proportionate measures against the complainant, as the case may be, in order to prevent and avoid a similar incident or conduct from recurring. Such measures include in particular:





the compliance recommendation

- a change of position, working hours, place or manner of work
- or even the termination of the employment or cooperation relationship

8.5 SciCo will never retaliate against a complainant, nor will SciCo allow retaliation to occur, to anyone who reports in good faith a possible violation of the law or this SciCo policy. Any form of retaliation is prohibited, is a serious disciplinary violation, and may result in disciplinary action, including termination of employment. However, this prohibition is not intended to protect individuals who intentionally submit false complaints. Employees who knowingly submit a false complaint shall be subject to disciplinary sanctions, including termination of their employment contract.

8.6 Prompt reporting is the most effective method of resolving actual or potential incidents of harassment. SciCo encourages all those subject to this to file complaints in a timely manner so that prompt and constructive action can be taken.

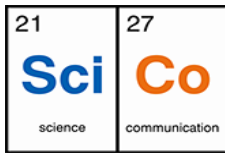
8.7 SciCo will always be at the disposal of the competent public authorities in order to assist, in any way, in the investigation and investigation of the reported incidents. It is understood that the collection, record keeping, and any processing of personal data will always be carried out in compliance with the General Data Protection Regulation (GDPR) and Law No. 4624/2019.

8.8 Each SciCo employee has a duty to co-operate with SciCo in any investigation conducted into complaints hereunder.

## **8. PROTECTION OF VICTIMS OF DOMESTIC VIOLENCE**

SciCo will assist any of its employees suffering domestic violence by any reasonable means or reasonable accommodation, which may include:

- Flexible working arrangements for a fixed period of time and reviewed periodically.
- Workplace safety and security planning (e.g. working in a non-isolated area).



## 9. DISCIPLINARY PROCEDURE

Following a proven and established violation of this policy, SciCo through Thodoris Anagnostopoulos, who has been appointed as the person responsible for the strict compliance with this policy, may resort to disciplinary proceedings and impose a disciplinary penalty on the culprit, commensurate with the seriousness of the violation at its sole discretion.

## 10. REPORTING PERSONS - Safeguarding manager

For any additional information or clarification regarding this policy, interested parties may contact Mr. Thodoris Anagnostopoulos, who has been appointed as the person responsible for the strict compliance with this policy of SciCo:  
Thodoris Anagnostopoulos  
theo@scico.gr

## 11. CONTACT DETAILS OF COMPETENT PUBLIC AUTHORITIES

- Citizen's Advocate  
Halkokondyli 17 P.C. 104 32 Athens  
E-mail: [press@synigoros.gr](mailto:press@synigoros.gr)  
Tel: (+30) 213 1306 600
  
- Labour Inspectorate (Labour Inspectorate)  
Contact details of the Regional Directorates of the Labour Inspectorate, available on its website  
<https://ypergasias.gov.gr/>
  
- SEPE complaints hotline 15512
  
- Citizens' hotline 1555
  
- Direct psychological support and counselling service for women victims of gender violence SOS 15900 of the General Secretariat for Family Policy and Gender Equality

## ANNEX 1

### **ASSESSMENT OF RISKS OF VIOLENCE AND HARASSMENT**

Bullying, harassment and violence continue to be a serious problem in various social realities, including the workplace, public spaces, virtual spaces such as the Internet, and social life in general. At the other end of the spectrum, work and interaction in the work environment can offer the potential for contribution to society, personal development of the employee, progress of SciCo and the creation of a respectful working environment.

The workplace should not be a breeding ground for any form of violence, harassment or intimidation. Such behaviour should be unacceptable in any work environment, regardless of the size of the organisation or the sector in which it operates.

Any form of harassment, intimidation and violence against workers, whether perpetrated by colleagues, company management or third parties, is unacceptable as it violates, among other things, the following laws Law 4808/2021 - Official Gazette 101/A/19-6-2021 "For the Protection of Workers - Establishment of an Independent Authority "Labour Inspection" - Ratification of Convention 190 of the International Labour Organisation for the Elimination of Violence and Harassment in the World of Work - Ratification of Convention 187", as well as the ethical values of the company, and are detrimental to, among other things, the mental and/or physical health of those affected.

#### **Definitions:**

- Violence and harassment are defined as forms of behaviour, acts, practices or threats of such, which are intended, lead or are likely to lead to physical, psychological, sexual or economic harm, whether they occur in isolation or repeatedly.
- Harassment means forms of conduct that have the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating, humiliating or offensive environment, regardless of whether they constitute a form of discrimination, and includes harassment on the grounds of gender or other grounds of discrimination.
- Sexual harassment is defined as any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that has the purpose or effect of violating the dignity of a person, and, in particular, creating an intimidating, hostile, degrading, humiliating, humiliating or offensive environment.
- Gender-based harassment means forms of conduct related to the gender of a person, which have the purpose or effect of violating the dignity of that person and creating an intimidating, hostile, humiliating, degrading, degrading or aggressive environment in accordance with Article 2 of Law No. 3896/2010 (A' 107) and par. 2 of Article 2 of Law No. 4443/2016 (A' 232). These forms of conduct include sexual harassment under Art. 3896/2010, as well as forms of conduct related to the sexual orientation, expression, identity or gender characteristics of the person.

- Workplace extortion is defined as the coercion of an employee to perform an act, omission or acquiescence that results in damage to the property of the coerced person and unlawful pecuniary gain to the extortionist or a third party. Coercion is defined as an act of the coercer which by force or by a threat capable of excluding the employee's self-will leads to the employee's act, omission or threat.
- - Labour exploitation is defined as all forms of labour exploitation that constitute a criminal offence under the law of the State in which the exploitation takes place. Labour exploitation covers a wide range of crimes, from serious offences such as slavery to acts bordering on serious labour exploitation and criminal offences. Indicative examples of labour exploitation include actions against the worker that violate human dignity in general, involve forced labour, violate fundamental freedoms, increase discrimination, undermine fair and just working conditions, etc.

### **1. Where forms of violence and harassment behaviour can take place:**

- In the workplace, including public and private spaces and places where the employee/co-worker/volunteer provides work/services/volunteer work, receives pay, takes a break, in particular, for rest or food, in personal hygiene and care areas, changing rooms or accommodation provided by SciCo.
- Travel to and from work, other travel, trips, education, and work-related events and social activities.
- In work-related communications, including those carried out through information and communication technologies. Managing the risks of violence and harassment. SciCo shall take appropriate measures to ensure that employees/co-workers/volunteers at SciCo receive all necessary information regarding, inter alia, the health and safety risks, as well as the protection and prevention measures and activities relevant either to SciCo in general or to any type of workplace and tasks, including the risks and measures to combat violence and harassment at work, including sexual harassment.

### **2. SciCo is obliged to:**

- Ensure that prevention and management measures are adapted to changes in circumstances and seek to improve existing situations.
- Implement the suggestions of health and safety inspectors and generally facilitate their work during inspections.
- Supervise the proper implementation of health and safety measures for employees.
- Make employees aware of the occupational hazard of their work.
- Develops a programme of preventive action and improvement of working conditions at SciCo, taking into account, in particular, the organisation of work, social relations, environmental and technological factors, as well as psychosocial risks.
- Ensures the maintenance and monitoring of the safe operation of equipment and facilities.

- Encourage and facilitate the training and education of employees and their representatives.
- Take collective measures to protect workers.

### **Violence and Harassment Risk Assessment**

As part of the SciCo violence and harassment risk assessment, an initial assessment of risk sources was conducted, focusing on severity, likelihood and frequency of exposure, based on employer reports. To record data and extract results, the "Violence & Harassment".

Taking into account SciCo's activity and based on the table below, the overall risk for this facility is estimated to be Windless

<b>Risk category</b>	<b>Degree of risk</b>
>400	Critical - Immediate action required to reduce the risk
400 - 200	High - Taking measures to reduce the risk in the short term
200-100	Medium - Taking measures to reduce risk in the medium term
100 -50	Low - Take measures to reduce the risk in the long term
<50	Tolerable - Maintenance of the measures in place to keep the risk at a tolerable level

Based on the results obtained from the risk assessment, the following is worth mentioning:

- Employees/co-workers/volunteers who work in the community, by virtue of working in public places or in clients' homes or in their own home environment (telecommuting) are exposed to the risk of harassment and violence, including domestic violence. Raising workers' awareness of the early identification of sources of risk and training them in prevention and management is important towards reducing both the severity and the likelihood of exposure to violence and harassment. Providing appropriate means of communication and help-seeking helps to protect these individuals.
- Moving around in a vehicle at work can be a risk factor for the employee/co-worker/volunteer. Exposure to violence and/or harassment is more likely due to the vulnerability of lone workers in changing environments. Informing workers/co-workers/volunteers of the risks involved, organizing the work schedule so that workers/co-workers/volunteers do not travel at night or take routes that are

not safe, and training workers/co-workers/volunteers in preventing and addressing the risks of violence and harassment associated with travel will help reduce the likelihood of a related incident occurring. Making means of communication available to these individuals to seek immediate assistance if they suspect they are exposed to these types of risks is important in reducing both the likelihood and severity of the incident.

- Travel by airplanes, tourist buses and public transport for the needs of SciCo missions/projects in the Greek province and/or abroad, as well as accommodation and catering in places where such services are provided, entails additional risks and may constitute an additional risk factor for the participating employees and/or partners and/or volunteers of SciCo, especially when the relevant missions and/or projects require the travel of SciCo employees/partners/volunteers to developing countries. Exposure to violence and/or harassment is more likely due to the vulnerability of visitors in a foreign country and without the ability to communicate in the language of the place they are visiting, the possible cultural and religious differences with the citizens of any countries they may be visiting and due to the changing environment during travel. Making employees/co-workers/volunteers aware of the risks involved, making very good travel and internal travel arrangements so that employees/co-workers/volunteers do not take routes that are not safe and training all of the above in preventing and addressing the risks of violence and harassment associated with relevant travel will help reduce the likelihood of a related incident occurring. Providing persons who speak the language of the area in question and have knowledge of the particular cultural and religious characteristics of the citizens of the foreign country in which a SciCo mission and/or project is being conducted to accompany employees/collaborators/volunteers, as well as providing adequate means of communication for such persons to seek immediate assistance if they suspect that they are exposed to such risks, is important in reducing both the likelihood and severity of the incident.
- In any case SciCo should take all measures aimed at preventing and avoiding incidents related to violence and harassment, tailored to each workplace. The purpose of the measures proposed is to create a working environment that respects, promotes and safeguards the right of every person to a world of work free of violence and harassment.